

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

1. Date filed: March 1, 2013
2. Name of company covered by this certification: Trillion Partners, Inc.
3. Form 499 Filer ID: 823288
4. Name of signatory: Byron Smyl
5. Title of signatory: Receiver
6. Certification:

I, Byron Smyl, certify that I am the Receiver appointed by the court to manage the company named above, and, acting as an agent of the company, I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.* There are currently no officers of this company.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed /s/ Byron Smyl  
Receiver  
Trillion Partners, Inc.

Attachment: Accompanying Statement explaining CPNI procedures

**Accompanying Statement to Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

**Trillion Partners, Inc.**

Trillion Partners, Inc. (“Trillion”) has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission’s regulations regarding the protection of customer proprietary network information (“CPNI”) rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Trillion provides a hosted Voice over Internet Protocol (“VoIP”) service to enterprise customers (primarily school districts) under the Commission’s E-rate program. Trillion’s fleeting use of customer information is strictly limited to internal call routing information necessary to connect calls to and from the local exchange carrier (“Call Routing Information”).

Because Trillion only provides VoIP service to enterprise customers and Trillion’s relationship with those customers is governed by private contractual arrangements, any disclosure of CPNI to a customer is made only to customer employees that are recognized by Trillion personnel as having authorization to access such data.

Trillion does not share customers’ CPNI within the company or with any third parties for marketing purposes.

Trillion employees have been trained in the appropriate use of CPNI, and the company will discipline employees for violation of its CPNI policy.

If an employee becomes aware of any suspected breach of CPNI protections, he or she is instructed to immediately notify his or her supervisor who will then be responsible, in consultation with legal counsel, for determining if Trillion has experienced a breach and, if one has occurred, then notifying the United States Secret Service, the Federal Bureau of Investigation, and the customer in a lawful and timely manner.